

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY  
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**PLAINTIFFS' RESPONSE TO DEFENDANTS' NOTICE OF CONFLICT IN  
SCHEDULING AND REQUEST FOR STATUS CONFERENCE**

In response to Defendants Michael J. Lindell and My Pillow, Inc.'s Notice of Conflict in Scheduling and Request for Status Conference, Plaintiffs Smartmatic USA Corporation, Smartmatic International Holding B.V. and SGO Corporation Limited ("Smartmatic" or "Plaintiffs") states that it can make itself available to the Court to discuss its Motion for Leave to Modify Scheduling Order to Allow Limited Depositions After Close of Fact Discovery any day prior to August 2, 2024, including remotely if the Court prefers. Smartmatic objects to waiting until August 20, 2024, as that would make it difficult to complete the requested depositions prior to the September 23, 2024 deadline to submit dispositive motions.

Dated: July 14, 2024

Respectfully submitted,

/s/ Timothy M. Frey

Christopher K. Larus

Minnesota Bar No. 0226828

CLarus@robinskaplan.com

William E. Manske

Minnesota Bar No. 0392348

WManske@robinskaplan.com

**ROBINS KAPLAN LLP**

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Telephone: (612) 349-8500

J. Erik Connolly (admitted *pro hac vice*)

EConnolly@beneschlaw.com

Illinois ARDC No. 6269558

Nicole E. Wrigley (admitted *pro hac vice*)

NWrigley@beneschlaw.com

Illinois ARDC No. 6278749

Timothy M. Frey (admitted *pro hac vice*)

TFrey@beneschlaw.com

Illinois ARDC No. 6303335

Julie M. Loftus (admitted *pro hac vice*)

JLoftus@beneschlaw.com

Illinois ARDC No. 6332174

**BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

71 South Wacker Drive, Suite 1600

Chicago, IL 60606

Telephone: (312) 212-4949

James R. Bedell (admitted *pro hac vice*)

JBedell@beneschlaw.com

Ohio Bar No. 97921

**BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

127 Public Square, Suite 4900

Cleveland, OH 44114

Telephone: (216) 363-4500

*Attorneys for the Plaintiffs*